

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**CRIMINAL NO: 3:19-cr-02**

**WARREN C. CLARK**

**AGREED MOTION TO CONTINUE**

COMES NOW Warren Clark through his attorneys Mike DeGeurin and Michael DeGeurin and moves the Court to continue the current pretrial and trial dates and to reissue a new scheduling order.

- 1) Mr. Clark is set for a Status conference on Thursday May 23, 2019.
- 2) Defense Counsel are in the process of getting a security clearance to review discovery. The process has begun but has not been completed.
- 3) The government has provided some discovery that has been redacted and in a form to be reviewed without a security clearance.
- 4) The parties have been in communication and are working through all issues as quickly and efficiently as practicable. Currently, there is no issue between parties that need a ruling from this Court.
- 5) Both parties agree that additional time is required to complete discovery and other pretrial issues.

WHEREFORE PREMISES CONSIDERED Mr. Clark respectfully request this court reset the Status conference for 60 days. Mr. Clark additionally requests the court issue a new scheduling order.

Respectfully submitted,

Foreman DeGeurin & DeGeurin

/s/ Mike DeGeurin

Mike DeGeurin

Federal Bar No. 3558

300 Main Street, Suite 300

Houston, Texas 77002

(713) 655-9000: Telephone

(713) 655-1812: Facsimile

### **Certificate of Conference**

I have conferred with AUSA Craig Feazel and Mark McIntyre on this 17<sup>th</sup> day of May, 2019 and they jointly request this continuance.

/s/ Mike DeGeurin

Mike DeGeurin

### **Certificate of Service**

A copy of this Motion was provided to the Assistant U.S. Attorneys on this 17<sup>th</sup> day of May, 2019 by filing the Motion electronically.

/s/ Mike DeGeurin

Mike DeGeurin